

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	NO. 04-10330-JLT
v.)	
)	
REUBEN LAMONT LACEFIELD,)	
Defendant.)	
)	

JOINT INITIAL STATUS CONFERENCE MEMORANDUM

The United States of America, by and through its attorneys, United States Attorney Michael J. Sullivan and Assistant United States Attorney Paul R. Moore, and defendant REUBEN LAMONT LACEFIELD, by and through his counsel, Page Kelley, Esq., jointly submit this memorandum to address the issues delineated in L.R. 116.5(A)(1)-(7).

1. The parties do not seek additional relief with regard to the timing requirements imposed by L.R. 116.3. The defendant respectfully requests an additional thirty (30) day period with which to further examine the discovery in this and other matters pending against the defendant.

2. The government and defendant request that this Court set dates for the discovery and reciprocal discovery concerning expert witnesses which may be necessary in the event of a trial in this matter.

3. The government has provided full and open-file discovery to the defense counsel and will continue to provide full and open-file discovery if and when further evidence becomes available to the government. The government is awaiting fingerprint comparison tests from the Federal Bureau of Investigation. Upon receipt of any such analysis, the government will

1/25/05
N. Russo

immediately notify the defendant's counsel of the results and will provide copies of those results to counsel. Having otherwise provided discovery, the government does not anticipate providing any additional discovery (other than that required to be produced at least twenty-one days prior to trial) but allows that it might do so in response to specific defense requests.

4. A motion date should be established for the filing of, and response to, substantive motions.

5. The parties would request that the time from the filing of this Joint Memorandum through the date on which the Final Status Conference is scheduled by this Court be excluded from calculation under the Speedy Trial Act, the reasons for which include that the parties continue to actively examine the evidence in an effort to seek resolution of this matter short of trial, pursuant to 18 U.S.C. § 3161(h)(1)(F).

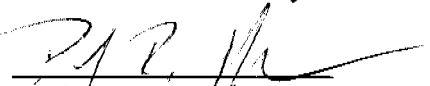
6. At this juncture, the parties consider a trial to be unlikely, although the defendant has not made a final determination as to whether the matter will proceed to trial.

7. The final status conference should be set coincident with the conclusion of the briefing period that the Court sets for the defendant's substantive motions (with consideration given to the defendant's request for an additional thirty (30) days in which to examine and consider the evidence produced by the government).

Respectfully submitted,

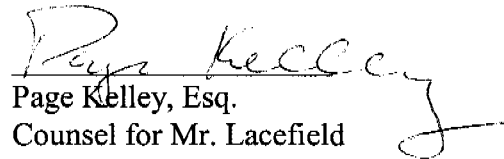
MICHAEL J. SULLIVAN
United States Attorney

By:


Paul R. Moore
Assistant United States Attorney

REUBEN LAMONT LACEFIELD
Defendant

By:


Page Kelley, Esq.
Counsel for Mr. Lacefield

DATE: January 25, 2005